

Waste Management Compliance

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Overview of Topics

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- ▶ Documentation Review
- ▶ Internal Field Inspections
- ▶ Training
- ▶ Procedures
- ▶ Develop a Compliance Calendar
- ▶ Did You Know?
- ▶ Conclusion

Introduction

- ▶ Waste management (non-hazardous and hazardous) is a daily activity at most sites
- ▶ State and federal regulations impose training, work practice standards, recordkeeping and reporting requirements on small and large quantity generators (KSQG, SQG and LQG) of hazardous waste
- ▶ Maintaining an organized process to ensure compliance on a daily basis helps ensure that you remain well-prepared for agency inspections and internal audits
- ▶ This presentation addresses waste management compliance from an industry perspective

Documentation Review

- ▶ Internal Weekly, Monthly, and Annual Reviews of Required Documentation
- ▶ Questions to ask about manifests
 - ▶ Are the manifests reviewed for discrepancies prior to shipment?
 - ▶ Is required information included on manifests?
 - ▶ EPA Generator ID
 - ▶ # of Pages (e.g., page 1 of 3, etc.)
 - ▶ Emergency Phone #
 - ▶ Manifest Tracking # (must be unique)
 - ▶ Generator Information
 - ▶ Transporter Information/EPA ID #
 - ▶ Proper DOT waste description with associated waste codes

Documentation Review, continued

- ▶ Questions to ask for manifests, continued
 - ▶ Are Land Disposal Restriction (LDR) forms complete?
 - ▶ Does LDR match manifest information (i.e. manifest tracking #, waste description with associated waste codes)?
 - ▶ Is there a current LDR on file for each waste stream and has it been provided to transporter?
 - ▶ Does your facility receive a copy of the manifest signed by the designated facility within 35 days for a LQG and 60 days for a KSQG and SQGs?

Documentation Review, continued

► Inspection Documentation

► Hazardous Waste Container Storage Yards (<90 Day and One Year)

- Inspector's printed name, signature, and date/time
- Have appropriate checklist items been addressed?
- Are there comments?
- Follow-up date and completion of possible corrective action

► Hazardous Waste Sumps

- Daily Completion of inspection forms
- Emptied every 90 days
- All boxes have been checked
- Review notations for abnormalities
- Assure correction actions have been completed
- Form signed and dated by inspector

Documentation Review, continued

► Inspections

- Non-Hazardous Waste Sumps
 - Cleaned as appropriate
 - Inspections
 - Assure corrective actions have been completed

► Profiles (Waste Characterization)

- Review Waste Determination documents as needed for updates
- Assure profiles haven't expired
- Assure there aren't changes that will affect waste characterization

Documentation Review, continued

- ▶ RCRA Permit Document Requirements
 - ▶ Depends on permit
 - ▶ Quarterly/Annual Reporting
 - ▶ Contingency Plan
 - ▶ Is it up to date?
 - ▶ Emergency contacts must have all pertinent information including mobile and home phone number and current address.
 - ▶ Assure dates are met and appropriate information is submitted

Documentation Review, continued

- ▶ Submittals to Agencies
 - ▶ Gather information from appropriate individuals for development of report
 - ▶ Conduct peer review of submittals prior to submittal to ensure accuracy
- ▶ See specific reporting requirements as a generator (KSGS, SQG, and LQG)
- ▶ Make sure all documents are submitted by mandated submittal date and retained for required amount of time

Internal Field Inspections

- ▶ Operations
 - ▶ Hazardous Waste Satellite Areas
 - ▶ Sumps
 - ▶ Inspections/Sign-off of drums going to storage yard
 - ▶ Inspections/Sign-off of for clean rubble material
- ▶ Environmental
 - ▶ Weekly storage yard inspections
 - ▶ Periodic inspections throughout facility
 - ▶ Assure all containers are labeled
 - ▶ Assure container's contents match the label
 - ▶ Assure hazardous waste drums are closed at all times
 - ▶ Assure the proper waste is in each container (i.e.. Trash only in trash containers)
 - ▶ Confirm that all waste is containerized

Training

- ▶ Periodic RCRA Off-Site Training for Waste Management Contact
- ▶ Training completed for all employees within 6 months of employment
- ▶ Training on specific topics throughout the year such as container management
- ▶ Annual Waste Management Training
 - ▶ All employees
 - ▶ Operators
 - ▶ Maintenance
 - ▶ Lab Personal
 - ▶ Administrative
 - ▶ Content
 - ▶ Regulatory requirements (Federal/State/Local)
 - ▶ Permit requirements

Training, continued

- ▶ Annual Waste Management Training, continued
 - ▶ Test
 - ▶ Covers all subjects discussed in training
 - ▶ Confirmation individuals understood content of training
 - ▶ Updated Annually
 - ▶ Review of information to determine accuracy

Procedures

- ▶ Universal Waste
 - ▶ Batteries
 - ▶ Lamps
 - ▶ Mercury
 - ▶ Pesticides
- ▶ Sump Management
 - ▶ Ownership
 - ▶ Inspections
 - ▶ Repair
 - ▶ Documentation of Inspections/Repairs

Procedures, continued

- ▶ Container Management
 - ▶ DOT Containers?
 - ▶ Labeling
 - ▶ Compatibility with waste
- ▶ Clean Rubble
 - ▶ Tracking
 - ▶ Inspections
- ▶ Waste Characterization
 - ▶ List of routine waste streams
 - ▶ Determination and justification

Procedures, continued

- ▶ Miscellaneous Waste Management
 - ▶ Non-Routine waste streams
 - ▶ Waste characterization (Hazardous/Non-Hazardous)
 - ▶ Disposal Methods
 - ▶ Examples
 - ▶ Used Containers
 - ▶ Used Antifreeze
 - ▶ Sharps
 - ▶ Used Rags
 - ▶ Cylinders

Procedures, continued

- ▶ Recycle/Reuse Waste Management
 - ▶ Determine which waste streams can be recycled/reused
 - ▶ Justification for recycle/reuse
 - ▶ Examples of routinely recycled materials
 - ▶ Used Oil
 - ▶ Scrap Metal
 - ▶ Spent Chemicals
 - ▶ Lamps
- ▶ Have a way to update and track changes of procedures and provide timely notification to employees

Develop a Compliance Calendar

- ▶ Contains schedule of tasks
 - ▶ All personal/areas have tasks that are required either internally or by state/local/federal regulations
 - ▶ Completion of tasks is documented by initials and dates
- ▶ Occurrence of tasks
 - ▶ Each task should have an associated occurrence rate
 - ▶ Each occurrence should be documented completed by an individual for accountability
- ▶ Review of Compliance Calendars
 - ▶ Assure all tasks are added
 - ▶ Review new projects to determine if a calendar update is warranted
 - ▶ Weekly checks to make sure tasks are completed as required

Did You Know?

- ▶ Containers in general trash that have non-hazardous materials still need to be labeled accordingly
- ▶ Aerosol cans with a broken nozzle that aren't empty cannot be placed in general trash
- ▶ Page numbers must be on manifests
- ▶ Inspection names and date/times must be readable and believable
- ▶ Annual training is required for ALL employees who handle any kind of waste

Did You Know?, continued

- ▶ Kansas has a regulatory requirement for "**Special waste**" which is defined as any solid waste that, because of physical, chemical, or biological characteristics, requires special management standards due to concerns for owner or operator safety regarding handling, management, or disposal.
- ▶ Antifreeze destined for recycling will not be viewed as hazardous waste, however the accumulation container must be labeled as "Used Antifreeze" and must go to a permitted solid waste facility
- ▶ Paint cans that still contain paint cannot be left open to dry prior to disposal in general trash-this is a form of treatment and must be permitted

Conclusion

- ▶ Be aware and knowledgeable about process and waste streams at your site(s)
- ▶ Be familiar with documentation and filing processes
- ▶ Review documentation on a regular basis
- ▶ Perform internal inspections of waste management practices
- ▶ Complete training of all affected personnel annually
- ▶ Update training when warranted
 - ▶ Assure up-to-date regulations are being used to develop training
 - ▶ Monitor changes at facility that create or remove waste streams
- ▶ Review “Compliance Inspection Report” (KDHE Document) to assure all documents/information is available to agencies when requested

Questions?